

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

John Bouchard, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

Dick's Sporting Goods, Inc.,

Defendant.

Civil Action No. 1:15-cv-6300

Judge Thomas M. Durkin

Magistrate Judge Jeffrey Cole

JOINT MOTION FOR STAY

Plaintiff John Bouchard ("Plaintiff") and Defendant Dick's Sporting Goods, Inc. ("Defendant") respectfully seek a stay of the case, including all case management deadlines, pending the outcome of mediation scheduled for September 10, 2015.

On May 29, 2015, Plaintiff filed a complaint in the Circuit Court of Cook County, County Department—Chancery Division, alleging that he was misclassified as exempt from overtime pay requirements under Illinois law. (Docket No. 1.) Plaintiff seeks to assert his claims on behalf of all Hardlines Managers, Softlines Managers, and Sales Support Managers in Illinois in the three years prior to the filing of the complaint. (*Id.*) On July 20, 2015, Defendant timely removed the action to the U.S. District Court for the Northern District of Illinois. (*Id.*) On July 27, 2015, Defendant answered the complaint, denying the material complaint allegations and asserting certain defenses. (Docket No. 9.)

On August 3, 2015, the parties entered into an agreement to mediate the claims at issue in the case before experienced wage and hour mediator Hunter Hughes. The mediation has been set for September 10, 2015, the first available date on the mediator's calendar. To allow the parties to focus their resources on reaching settlement, and to avoid the burden and expense of continued

litigation of this matter, the parties now jointly seek a stay of the instant case, and the continuation of all forthcoming case management deadlines until after the September 10, 2015 mediation. Specifically, the parties request a stay of the following deadlines, as set in the Court's July 27, 2015 Order (Dkt. No. 8):

- September 23, 2015: Deadline to file a joint status report.
- September 28, 2015: Status hearing

The parties agree to report to the Court on the outcome of mediation by September 14, 2015.

Dated: August 11, 2015

Respectfully submitted,

DICK'S SPORTING GOODS, INC.

By its attorneys,

s/Julie M. Baker

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CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2015, I electronically filed the foregoing Joint Motion for Stay with the Clerk of Court using the Court's CM/ECF system, which will send notification of such filing to counsel of record at their e-mail address on file with the Court, and, paper copies will be sent to those indicated as non-registered participants.

s/Julie M. Baker
Attorney for Dick's Sporting Goods, Inc.